



**IOWA TELECOM**  
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February 26, 2009

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: EB Docket 06-36  
Annual Certification and Accompanying Statement for 2008  
499 Filer ID: 820463

Dear Ms. Dortch:

Iowa Telecommunications Services, Inc. submits the Annual Certification and Accompanying Statement for 2008 as required by 47 C.F.R. § 64.2009(e) and in accordance with the Public Notice DA 09-9, issued on January 7, 2009.

If you have any questions or need additional information, please contact me directly on 641-787-2396.

Sincerely,

  
Barbara E. Bouley  
Manager-Regulatory

Cc: Best Copy and Printing, Inc  
Via e-mail FCC@BCPIWEB.COM  
445 12<sup>th</sup> Street  
Suite CY-B402  
Washington, DC 20554

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification: Iowa Telecommunications Services, Inc.

Form 499 Filer ID: 820463

Name of signatory: Tim Lockhart

Title of signatory: Vice President – Customer Service & Human Resources

I, Tim Lockhart, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company did not take any actions against data brokers in 2008.

The company did not receive any customer complaints in 2008 concerning the unauthorized release of CPNI.

Signed

  
\_\_\_\_\_  
Tim Lockhart

## **Iowa Telecommunications Services, Inc.**

### **Compliance Statement**

Iowa Telecommunications Services, Inc. ("Iowa Telecom") has the following safeguards in place to ensure compliance with Section 222 of the Communications Act of 1934, as amended.

- Personnel (both sales and marketing) receive training as to when they are and are not authorized to use customer proprietary network information ("CPNI"), and an express disciplinary procedure is in place when an Iowa Telecom policy is not followed. Training is included as part of the initial training and refresher training as required.
  - CPNI may be used, disclosed or access permitted for the purpose of marketing service offerings among the category of services to which the customer already subscribes.
  - Where the company and/or its affiliates provide different categories of service and the customer subscribes to more than one category of service, CPNI may be shared among the affiliated entities that provide a service to the customer.
  - Where the company and/or its affiliates provide different categories of service and the customer does not subscribe to more than one offering, CPNI may not be shared among the affiliated entities that provide a service to the customer unless the customer provides permission to share the information.
- Iowa Telecom sends a welcome informational packet to all new customers that includes an explanation of CPNI and a form to submit to the company if they choose to opt-out of the use of their CPNI. Once a customer notifies the company that they choose to opt-out, the use of the CPNI is restricted until such time as the customer notifies the company to change the opt-out status of their account.
- The Iowa Telecom website provides information regarding CPNI and a link to email the company to request opting-out of the use of a customer's CPNI. The customer can also dial 611 from any Iowa Telecom telephone and request opting-out of the use of the CPNI on their account.
- Biennial notification is sent to all customers that includes an explanation of CPNI and how the customer may request opting-out of the use of the CPNI on their account.
- The customer's CPNI approval status is clearly visible on the account records.
- CPNI is not provided to or disclosed to third parties. Iowa Telecom does not disclose or provide access to joint venture partners or independent contractors.

- Records are retained at least one year of the sales and marketing campaigns using CPNI. The records include a description of each such campaign, the dates and purpose of the campaign, the specific CPNI used, and the products and services offered.
- Supervisory approval is required to develop out-bound marketing plans for mailings and calling campaigns.
- Iowa Telecom has systems in place to establish and maintain password protection on the customer's account and to allow the customer to establish a security question and answer in the event the password is forgotten or lost.
- Iowa Telecom properly authenticates the customer prior to releasing call-detail information without using readily available biographical information or account information. Where the customer cannot provide the password but can provide call detail information to Iowa Telecom without assistance, Iowa Telecom will respond to the specific question. Where the customer cannot provide the password or call detail information, Iowa Telecom will send the call detail information to the customer's address of record or call the customer at the telephone number of record.
- In-store access to CPNI is allowed only upon presentation of a valid photo ID matching the customer's account information.
- On-line access to account information is not currently available.
- Iowa Telecom notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record are changed.
- The requirements under 47 C.F.R. § 64.2011 *Notification of customer proprietary network information security breaches* will be followed should a breach of its customers' CPNI occur.